

Exhibit G

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

ZACHARY ADAMSON,

Plaintiff,

- VS -

CITY OF BUFFALO, CITY OF BUFFALO,
POLICE DEPARTMENT, JOSEPH COOK,
MICHAEL KEANE and SHARON ACKER,

Defendants.

**NOTICE FOR DISCOVERY
AND INSPECTION**

Civil Docket No. 11-CV-0663A

SIRS:

PLEASE TAKE NOTICE that the Defendants herein, pursuant to Rule 26 of the Federal Rules of Civil Procedure, are required to produce and allow discovery, inspection and copying to be made by the Plaintiff and attorneys for the Plaintiff of the following items, writings, and objects maintained, controlled or supervised by the Defendants or the agents, servants and/or employees of the Defendants. In lieu of strict compliance with the terms and conditions of this Notice, the undersigned will accept clearly legible photographs of the said items if received by the undersigned at least five (5) days prior to the return date hereof, together with a letter from the attorney for the Defendants advising as to the completeness of the items provided.

PLACE OF DISCOVERY: 2 Symphony Circle, Buffalo, New York 14201

DATE AND TIME OF DISCOVERY: May 29, 2012 at 10:00 o'clock in the forenoon.

**ITEMS TO BE PRODUCED RELATING TO ZACHARY ADAMSON WHO WAS
INJURED ON OR ABOUT APRIL 1, 2010, INCLUDING:**

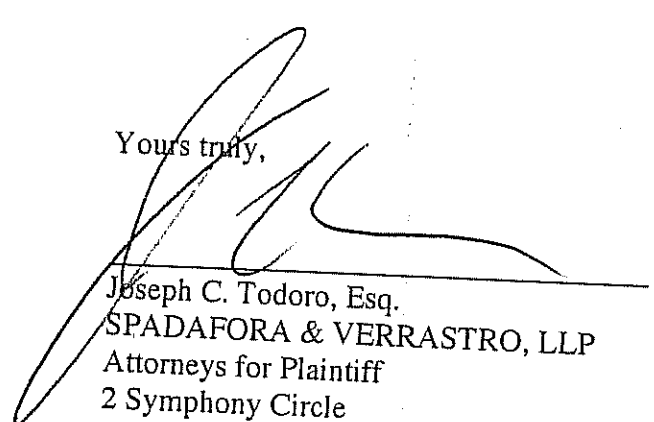
1. Documents, information, memorandums, reports, Intelligence files and documents contained therein and other documents in the possession or control of the Buffalo Police Department and/or the Corporation Counsel of the City of Buffalo relating to any criminal activity of ZACHARY ADAMSON prior to April 1, 2011.
2. Personnel files, documents, information, memorandums, reports, Intelligence files and documents contained therein and other documents in the possession or control of the Buffalo Police Department and/or the Corporation Counsel of the City of Buffalo relating to the following Police Officers relating to any complaints made against any of the following-named Officers by any person while they were in the employ of the Buffalo Police Department:
 - a) JOSEPH COOK;
 - b) MICHAEL KEANE; and
 - c) SHARON ACKER.
3. Personnel files, documents, information, memorandums, reports, Intelligence files documents, employee handbooks and employee manuals in regards to hiring, training, supervising and orientating employees of the City of Buffalo and/or Buffalo Police Department including police officers, contained therein and other related documents in the possession or control of the Buffalo Police Department and/or the Corporation Counsel of the City of Buffalo.

PLEASE TAKE FURTHER NOTICE that all demands contained herein are continuing demands up to and including the time of Trial. Any items obtained after service of this demand are to be furnished to this office within ten (10) days of your receipt thereof.

PLEASE TAKE FURTHER NOTICE that if you fail to comply with this Notice for Discovery and Inspection, or any part thereof, we shall rely on all sanctions provided under any applicable law.

DATED: May 17, 2012.
Buffalo, New York

Yours truly,

A large, stylized handwritten signature in black ink, appearing to read 'J. Todoro', is written over a horizontal line.

Joseph C. Todoro, Esq.
SPADAFORA & VERRASTRO, LLP
Attorneys for Plaintiff
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Buffalo, New York 14201
(716) 854-1111

TO: Carmen J. Gentile, Esq.
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